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Please reply to New York

December 19, 2024

VIA ECOURTS FILING

Honorable Lewis J. Liman, U.S.D.J.

United States District Court Southern District of New York

Daniel Patrick Moynihan

United States Courthouse

500 Pearl St.

New York, NY 10007-1312

RE: **CATLIN INSURANCE VS. CHAMP CONSTRUCTION, ET AL.**

Our File No. : 94407a SME

Docket No. : 1:24-CV-4499

Dear Judge Liman:

This office represents Plaintiff Catlin Insurance Company in this matter. As discussed during last Friday's Initial Pretrial Conference and per Your Honor's Individual Practices, Plaintiff and defendants GZA Geoenvironmental, Inc., also known as Goldberg Zoino Associates of New York, P.C ("GZA") and Gilsanz Murray Steficek LLC ("Gilsanz") have agreed to a briefing schedule for GZA's pending Motion to Dismiss [ECF No. 101] and Gilsanz's soon to be filed Motion to Dismiss as follows:

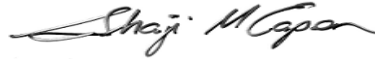
- 1) Gilsanz files its Motion to Dismiss no later than December 24, 2024;
- 2) Plaintiff files its opposition to both GZA and Gilsanz's Motions to Dismiss by January 20, 2025; and
- 3) GZA and Gilsanz file reply papers by January 27, 2025.

Methfessel & Werbel, Esqs.
Our File No. 94407a SME
Page 2

Please contact my office should there be any questions or concerns about this briefing schedule.

Respectfully submitted,

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Our File No. 94407a SME
Page 3

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